



May 21, 2021

Mr. Austin F. Callwood, Director  
Division of Environmental Protection  
Department of Planning & Natural Resources  
45 Mars Hill  
Frederiksted, V.I. 00840-4474

**SUBJECT: No. 8 Flare H<sub>2</sub>S Exceedance – May 14, 2021**

Dear Mr. Callwood:

This letter is submitted in compliance with Condition No. 2.4.5.1 of Limetree Bay Title V permit as a follow-up to the email notification to Ms. Verline Marcellin of the Division of Environmental Protection on May 14, 2021 at 1:20 AM regarding the H<sub>2</sub>S exceedance event at the No. 8 Flare header.

The Continuous Emissions Monitoring System (CEMS) at the No. 8 Flare recorded H<sub>2</sub>S concentrations in excess of 162 ppmv based on a 3-hr rolling average (ref. Title V permit condition 3.2.5.5 & 3.2.5.6) from 12:00 AM to 8:00 AM on May 14, 2021.

The following table provides 3-hr H<sub>2</sub>S concentrations at the No. 8 Flare header during the exceedance event.

Source		FLARE08
Parameter	Unit	H2SPPMD (PPM)
05/13/21	23:00	104.0
05/14/21	00:00	191.2
05/14/21	01:00	458.8
05/14/21	02:00	660.1
05/14/21	03:00	669.4
05/14/21	04:00	471.3
05/14/21	05:00	317.9
05/14/21	06:00	249.5
05/14/21	07:00	203.6
05/14/21	08:00	164.1
05/14/21	09:00	142.4

Upon investigation, it was determined that the process safety valve (PSV) associated with the blowdown tower at the coker unit was the source of the H<sub>2</sub>S. For corrective action, the PSV to the flare was isolated. The PSV was sent to the Limetree Bay valve shop for repair.



**LIMETREE BAY**  
REFINING, LLC

If you have any questions or need additional information, please contact Maria Aloyo at (340) 692-3781.

Sincerely,

Neil Morgan  
VP, Refinery and General Manager  
Limetree Bay Refining, LLC

NM/sm/ts

Electronic Copy:  
Verline Marcellin (DPNR)  
Harish Patel (EPA)  
Patrick Foley (EPA)  
Robert Buettner (EPA)